

# CORRESPONDENCE/MEMORANDUM

State of Wisconsin

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TO: Richard Wulk

FROM: Mary E. Oleson

Taylor, WI

SUBJECT: Response to Comments on the Preliminary Determination for Atlas Resin Proppants, LLC,  
Permit 627005280-P10.

Public Notice Published: 9/21/2011  
End of Public Comment Period: 10/21/2011

Comments on the draft permit were submitted by Joe Liello of TRC Solutions on behalf of Atlas Resin Proppants via email dated October 4, 2011. The comments were incorporated into the proposed permit as follows:

Conditions I.E.1.b.(3) and (6), I.E.1.c.(3), I.J.1.b.(3) and (6), and I.J.1.c.(3): Due to frequent fouling of the scrubber liquor flow rate meters the department approved the use of visual inspections to confirm the return flow of scrubber liquor to the sludge tank, coupled with monitoring and recording the motor power of the scrubber liquor recirculation pumps. Changes were made to conditions I.E.1.b.(6), I.E.1.c.(3)(d) and (e), I.J.1.b.(6), I.J.1.c.(3)(d) and (e) of the draft permit to reflect this. Further clarification of these requirements was made in the proposed permit. Condition I.E.1.b.(3) and I.J.1.b.(3) were revised to state:

- (3) To verify wet scrubber liquor flow, the permittee shall do one of the following:
- (a) Operate instrumentation to monitor the wet scrubber liquor flow rate, in gallons per minute [s. NR 439.055(1)(e), Wis. Adm. Code and 05-JAJ-015]; or
  - (b) Conduct visual inspections of the scrubber liquor pump flow to confirm return flow of scrubber liquor to sludge tank and monitor and record the motor power of the scrubber liquor recirculation pump. [s. 285.65(4), Wis. Stats. and s. NR 407.09(4), Wis. Adm. Code]

The above condition replaces conditions I.E.1.b.(3) and (6) and conditions I.J.1.b.(3) and (6) of the draft permit.

To be consistent with conditions I.E.1.b.(3) and I.J.1.b.(3), conditions I.E.1.c.(3) and I.J.1.c.(3) were clarified to state:

- (3) The permittee shall measure and record the following operational variables once for every 8 hours of operation or once per day, whichever yields the greater number of measurements:
- (a) Pressure drop across the wet scrubber and demister, in inches of water column,
  - (b) pH of the absorption scrubbing fluid,
  - (c) Either:
    - (i) Flow of liquor, in gallons per minute; OR
    - (ii) Motor power of the scrubber liquor recirculation pump, and the results of the visual inspections required by I.E.1.b.(3)(b), including the date, time, and name or initials of the individual performing the inspection.
- [s. NR 439.055(2)(b), Wis. Adm. Code, and s. 285.65(4), Wis. Stats., and 05-JAJ-015]

Conditions I.E.1.b.(7) and I.J.1.b.(7): The department waived the requirement to measure the solids content of the scrubber liquor, in a letter from Mr. Jeffery Johnson (WDNR) dated February 25, 2011. Conditions I.E.1.b.(6), I.J.1.b.(6), I.E.1.c.(3)(d) and I.J.1.c.(3)(d) were removed from the existing permit to reflect this waiver. Conditions I.E.1.b.(7) and I.J.1.b.(7) shall also be removed from the draft permit to be consistent with this waiver.

Conditions I.E.3.a.(1)(a) and I.J.3.a.(1)(a): These conditions require operation of the scrubber control device at all times the processes covered by the sections are in operation. These conditions omitted some of the process lines covered by the corresponding section and included some that were not included in the section. These conditions were corrected as follows:

- (a) The facility shall operate the wet scrubber at all times processes P51, P52, and P53 ~~-54, T31, and T32~~ are operational, with monitoring of parameters: pressure differential, liquor flow rate, and pH of the scrubbing fluid.
- (a) The facility shall operate the wet scrubber at all times processes P151, P152, and P153 ~~P127-129, 151-153, T131, and T132~~ are operational, with monitoring of parameters: pressure differential, liquor flow rate, and pH of the scrubbing fluid.

Note: Process P54 is no longer operational, T31, T32, T131, and T132 are not sources of air pollution, and P127-P129 are not covered by section I.J. of the permit.

Conditions I.E.4. and I.J.4.: These conditions include references to “flake resin”. The type of resin used to establish the limits in the original permit is more accurately identified as “novalac resin”. The form can vary from flake, powder, etc. The form of the resin does not affect the emissions. The permittee currently also uses “resol” resin. Based on information submitted by the permittee, emissions from resol resin are approximately 20 to 30 percent of the emissions from novalac resin. Use of the resol resin as an alternate raw material was discussed with Tom Ponty of WDNR on 8/24/2010. Corrections were made to remove the reference to “flake” when describing the resin used in the permit conditions in these sections. References to “flake” resin were also corrected in the corresponding CAM plans.

Conditions I.E.4.a.(1), I.E.4.b.(1), I.E.4.c.(2), I.J.4.a.(1), I.J.4.b.(1), and I.J.4.c.(2): The permittee presented information showing emission rates for the originally permitted novalac resin and emission rates for the alternate resol resin they are now using at the facility. **The permittee showed that emissions from the resol resin are about 20 to 30 percent of the emissions from novalac resin.** Because the two resins used have different emission rates the permittee has requested to change the resin usage rate limits in the current permit (in pounds resin per month, based on a 12 month rolling average) to a phenol emission rate limit (in pounds per month, based on a 12 month rolling average).

The current permit restricts the use of resin in processes P51, P52, and P53 to 586,417 pounds per month on a 12-month rolling average. This usage limit was elected by the permittee and limits phenol emissions to 9.5 tons per year. The permittee is proposing to change this limitation to 1583 pounds of phenol per month on a 12-month rolling average. This emission rate is also equivalent to 9.5 tons of phenol emitted per year. So making this change does not result in an increase in emissions and is therefore not considered a modification for construction permitting purposes per ch. NR 406, Wis. Adm. Code.

The current permit restricts the use of resin in processes P151, P152, and P153 to 850,800 pounds per month on a 12-month rolling average. This usage limit was elected by the permittee and limits phenol

emissions to 9.5 tons per year. The permittee is proposing to change this limitation to 1583 pounds of phenol per month on a 12-month rolling average. This emission rate is also equivalent to 9.5 tons of phenol emitted per year. So making this change does not result in an increase in emissions and is therefore not considered a modification for construction permitting purposes per ch. NR 406, Wis. Adm. Code.

Conditions I.E.4.a.(1) and I.J.4.a.(1) of the proposed permit have been changed to the following:

- (1) The processes may not emit more than 1,583 pounds of phenol per month, based on a 12-month rolling average (9.5 tons per year). [s. 285.65(7), Wis. Stats., and 07-JAJ-042-R1]

Limiting the phenol emissions rather than the amount of resin used is allowed under the "Formula Based Approach". The calculations outlined in conditions I.E.4.b.(1) and I.J.4.b.(1) of the draft permit were to demonstrate compliance with the resin usage rate limitation by calculating the average monthly usage amounts of resin. To demonstrate compliance with the phenol emission rate limitations in the proposed permit the calculations to demonstrate compliance in I.E.4.b.(1) and I.J.4.b.(1) has been changed to the following:

- (1) Each calendar month, the permittee shall calculate the phenol emissions from this stack as follows. This calculation shall be performed within 15 calendar days of the end of each month. [s. NR 407.09(4)(a), Wis. Adm. Code and 05-JAJ-015-R1]

$$E_{\text{phenol}} = \sum[(EF_i \times Z_i) \times (1 - C_{\text{eff}})]$$

where,

$E_{\text{phenol}}$  is the monthly phenol emissions in pounds per month;

$EF_i$  is an emission factor of the amount of phenol emitted per pound of each resin "i" used (lbs-phenol/lb resin)<sup>1</sup>;

$Z_i$  is the amount of resin "i" used in pounds per month; and

$C_{\text{eff}}$  is the efficiency of any control device controlling phenol emissions.<sup>2</sup>

- (2) To demonstrate compliance with condition I.E.4.a.(1) (I.J.4.a.(1)), the permittee shall calculate the average phenol emissions from the facility over each 12 consecutive month period by summing the monthly phenol emissions as calculated in I.E.4.b.(1) (I.J.4.a.(1)) for each consecutive 12 month period and dividing by 12. This calculation shall be performed within 15 calendar days of the end of each month for the previous 12 consecutive month period. [s. NR 407.09(4)(a)1., Wis. Adm. Code and 05-JAJ-015-R1]

With changing the limitation and associated calculations from a resin usage based limit to a phenol emission limitation, the record keeping conditions of I.E.4.c.(2) and I.J.4.c.(2) also need to be changed to be consistent with the limitation and the compliance demonstration method. Conditions I.E.4.c.(2) and I.J.4.c.(2) of the draft permit has been changed to the following:

- (2) The permittee shall maintain records of the following:

<sup>1</sup> At the time of permit issuance, two types of resins are used, novalac and resol. The emissions factor for novalac resin ( $EF_{\text{novalac}}$ ) is 0.0059 for P51, P52, and P53 (0.0041 for P151, P152 and P153) lbs-phenol/lb novalac resin. The emission factor for resol resin ( $E_{\text{resol}}$ ) is 0.0012 lbs-phenol/lb resol resin. The permittee may use alternate emission factors if approved by the department in writing.

<sup>2</sup> At the time of permit issuance  $C_{\text{eff}}$  is 54.5 percent as established by stack testing conducted in June 2006. The permittee may use a  $C_{\text{eff}}$  as determined during the most recent phenol compliance emission test, and as approved by the department in writing.



- (a) The total amount of each resin used in pounds per month ( $Z_i$ );
- (b) The monthly phenol emission rate in pounds per month ( $E_{\text{phenol}}$ ) as calculated in I.E.4.b.(1) (I.J.4.b.(1));
- (c) The 12-month rolling average phenol emission rate for each consecutive 12 month period, as calculated in I.E.4.b.(2) (I.J.4.b.(2)); and
- (d) Material safety data sheets or other technical documents which show the free phenol content of each resin used.

[s. NR 407.09(4)(a)1., Wis. Adm. Code, and s. 285.65(7), Wis. Stats., and 05-JAJ-015]

Facility Wide Ammonia Limits – Conditions I.XXX.1.b.(1) and (4):

The calculation outlined in conditions I.XXX.1.b.(1) and (4) uses an emission factor of 0.159 pounds of ammonia emitted per pound of hexa solution used. The permittee has requested that this emission factor be changed to be in units of pounds ammonia emitted per pounds of hexa rather than hexa solution. The calculation from the Preliminary Determination is as follows:

Hourly Ammonia MTEs = (69.85 lbs  $\text{NH}_3$ /hr per tower)(2 towers) = 139.70 lbs/hr

Annual Ammonia MTEs = (139.7 lbs  $\text{NH}_3$ /hr)(8760 hr/yr)(1 ton/2000 lbs) = 611.89 tpy

Maximum hexa solution usage in both towers: 880 lbs/hr

$\text{NH}_3$  Emission factor = (139.70 lbs  $\text{NH}_3$ /hr)(1 hr/880 lbs hexa soln) = 0.159 lbs  $\text{NH}_3$ /lb hexa soln

Assuming the hexa solution is 0.5684 pounds hexa per pound hexa solution the emission factor would be:

$\text{NH}_3$  Emission factor = (139.70 lbs  $\text{NH}_3$ /hr)(1 hr/880 lbs hexa soln)(1 lb hexa soln/0.5684 lbs hexa)  
= 0.27928 lbs  $\text{NH}_3$ /lb hexa

Conditions I.XXX.1.b.(1) and I.XXX.1.b.(4) of the draft permit were changed to use an emission factor of 0.27928 lbs  $\text{NH}_3$  per pound hexa rather than an emission factor of 0.159 lbs  $\text{NH}_3$  per pounds hexa solution.

Additionally all references to hexa solution in section I.XXX.1. of the draft permit have been replaced with hexa.

Facility Wide Ammonia Limits – Conditions I.XXX.1.a.(2), I.XXX.1.b.(5), (6), and (7) and I.XXX.1.c.(3), and (4):

The permittee has requested that the permit allow them to demonstrate compliance with the ch. NR 445, Wis. Adm. Code requirements using dispersion modeling as allowed for in s. NR 445.08(2)(b) and (e), Wis. Adm. Code.

Section NR 445.08(2)(b), Wis. Adm. Code states that one method of achieving compliance is by “(l)imiting the quantity, concentration or duration of a non-exempt, potential to emit emissions from the source of each hazardous air contaminant, so that the ambient air concentration is less than the concentration allowed under column (g) of Table A of s. NR 445.07, Wis. Adm. Code.”

Section NR 445.08(2)(e), Wis. Adm. Code states that another method of achieving compliance is by “(l)imiting the concentration of each hazardous air contaminant in the stack to less than the ambient air concentration allowed under column (g) of Table A for that contaminant.”

While including these alternative compliance method options, would give the permittee more flexibility, they could potentially allow an increase in ammonia emissions from what is currently allowed which could be a modification to the source. A "modification" is defined in s. 285.01(26), Wis. Stats. as "any physical change in, or change in the method of operation of, a stationary source that increases the amount of emissions of an air contaminant or that results in the emission of an air contaminant not previously emitted". Therefore the changes allowed under these alternative compliance methods could potentially trigger the need for a construction permit under ch. NR 406, Wis. Adm. Code. Section NR 406.04(2)(f)1., Wis. Adm. Code exempts modifications from construction permitting requirements if the maximum theoretical emissions from the source are not greater than the emission rate for the air contaminant listed in Table A of s. NR 445.07 for the respective stack height. In this case for ammonia, the emission rates in Table A for stacks that are greater than 75 feet in height are 28.2 pounds per hour and 612,587 pounds per year.

Depending on the type of changes made at the facility, the exclusions from modification in s. NR 406.04(4), Wis. Adm. Code could apply. Section NR 406.04(4)(a) exempts a modification to use an alternate raw material if the source has: continuously had such design capability; the use will not cause or exacerbate the violation of an ambient air quality standard; the use is not prohibited by any permit, plan approval or special order applicable to the source; the use will not result in a violation of any emission limit in chs. 405, 408, 409, 415 to 436 and 445; and the use will not subject the source to any standard or regulation under section 112 of the Act (42 USC 7412), excluding section 112(d)(5) or (r). Section NR 406.04(4)(d) exempts increases in production rates if: the increase does not exceed the design capacity of the source; the increase does not require any change to existing equipment, the increase is not prohibited by any permit, plan approval or special order; and the increase will not cause or exacerbate the violation of an ambient air quality standard or ambient air increment or violate an emission limit. Section NR 406.04(4)(e) exempts an increase in hours of operation if: the increase is not prohibited by any permit, plan approval, or special order; and the increase will not cause or exacerbate the violation of an ambient air quality standard or violate an emission limit.

Without knowing specifically what change the permittee would make that would increase ammonia emissions so that one of the compliance methods in s. NR 445.08(2)(b) or (e) would be used instead of the methods listed in the draft permit, it is impossible to determine whether a construction permit may be required for the change, until the time the specific change is being made. Therefore, when including these two alternative NR 445 compliance methods in the permit, requirements for the permittee to perform and submit an evaluation of whether a construction permit is required for the change are also included. The permit requires the permittee to submit a detailed air quality dispersion analysis for department review and will allow the use of one of the alternative methods only after written department approval has been received.

To allow for the use of the compliance methods allowed by ss. NR 445.08(2)(b) and (e) conditions in the draft permit have been changed as follows:

**LXXX.1.a.(2)** \* The permittee shall limit facility wide ammonia emissions in one of the following ways:

(a) Limit hexamethylenetetramine (hexa) use to not more than the following rates [ss. NR 445.07(1)(a) and NR 445.08(2)(b), Wis. Adm. Code]:

(i) Total hexa usage in Tower A and Tower B, combined may not exceed 7,310 pounds per day;

(ii) Hexa usage in Tower A may not exceed 5,375 pounds per day; AND

(iii) Hexa usage in Tower B may not exceed 7,029 pounds per day.

OR

(b) Limit ammonia emissions to less than 28.2 pounds per hour averaged daily. [ss. NR 445.07(1)(a) and NR 445.08(2)(a), Wis. Adm. Code]

OR

(c) Provided the permittee has prior written approval from the department, limit the quantity, concentration or duration of ammonia, potential emissions from the facility so that the ambient air concentrations off the source property are less than the concentrations allowed under column (g) of Table A of s. NR 445.07, Wis. Adm. Code.<sup>3</sup> [s. NR 445.08(2)(b)]

OR

(d) Provided the permittee has prior written approval from the department, limit the concentration of ammonia in the stack to less than the ambient air concentrations allowed under column (g) of Table A of s. NR 445.07, Wis. Adm. Code. [s. NR 445.08(2)(e), Wis. Adm. Code]

**I.XXX.1.b.(4)** If complying with I.XXX.1.a.(2)(b), (c) or (d), the permittee shall use one of the following methods as approved by the department in writing:

(a) calculate daily average, hourly ammonia emissions as follows:

$$E_{\text{daily}} = (0.27928 \times W_{\text{hexa}}) \times (1 - C_{\text{eff}}) \times (1 \text{ day}/24 \text{ hours})$$

Where:

$E_{\text{daily}}$  is the daily average hourly ammonia emissions in pounds per hour;

0.27928 is an emission factor of the amount of ammonia emitted per pound of hexa used (lbs  $\text{NH}_3$ /lb hexa);

$W_{\text{hexa}}$  is the amount of hexa used during the day in pounds per day; and

$C_{\text{eff}}$  is the efficiency of any control device controlling ammonia emissions.; OR

(b) Operate the ammonia control device(s) and associated monitoring equipment, so that the control device parameters monitored during the compliance emission testing under I.XXX.1.b.(5) are monitored and maintained within the normal operating ranges determined during the compliance emission test and as approved by the department in writing.

[s. NR 407.09(4)(a)1., Wis. Adm. Code]

**I.XXX.1.b.(5)** In order to take ammonia control equipment into account when demonstrating compliance with the requirements of I.XXX.1.a.(1) and (2), the permittee shall:

(a) Perform compliance emission testing to determine the ammonia control efficiency of any ammonia control device;

(b) Perform the compliance emission testing in accordance with the requirements of section I.ZZZ.2.;

(c) Monitor appropriate control device parameters as required by s. NR 439.055, Wis. Adm. Code, or other appropriate control device parameters as approved by the department, during the compliance emission testing;

(d) Establish normal operating ranges for control device parameters monitored as required by I.XXX.1.b.(5)(c);

(e) Submit a request for written department approval to use the control efficiency determined during the compliance emission test when calculating ammonia emissions according to the equations in I.XXX.1.b.(1), (2), and (4). This written request shall include, but not be limited to:

(i) A summary of the compliance emission test results, including the ammonia control efficiency determined during the test;

(ii) The control device parameters monitored during the compliance emission test, including the normal operating ranges established during the test; and

<sup>3</sup> The acceptable ambient air concentrations for ammonia from Table A of s. NR 445.07, Wis. Adm. Code, at the time of permit issuance are  $418 \mu\text{g}/\text{m}^3$  on a 24-hour average and  $100 \mu\text{g}/\text{m}^3$  on an annual average.

(iii) Calculations showing that ammonia emissions will be less than the following rates, averaged daily while operating the control device(s) within the established normal operating ranges:

- a) 28.2 pounds per hour; or
- b) the emission rate established using air dispersion modeling as required by I.XXX.1.b.(6), if approved by the department in writing; OR
- c) the emission rate established using stack gas concentration measurements as required by I.XXX.1.b.(7), if approved by the department in writing.

[s. NR 439.075(1)(b), Wis. Adm. Code]

**I.XXX.1.b.(6)** If complying with I.XXX.1.a.(2)(c), the permittee shall:

- (a) Perform a detailed air quality dispersion modeling analysis and submit the results to the department. This analysis shall be performed using AERMOD or other dispersion model approved by the department;
- (b) Identify the ammonia emission rate, and associated stack parameters and operating conditions used in the air dispersion modeling that are necessary to ensure the ambient air concentrations off the source property are less than the concentrations allowed under column (g) of Table A of s. NR 445.07, Wis. Adm. Code;
- (c) If the air dispersion modeling results show an increased ammonia emission rate can be allowed while the ambient air concentrations off the source property are less than the concentrations allowed under column (g) of Table A of s. NR 445.07, Wis. Adm. Code, then the permittee shall evaluate whether the increase in emissions is a modification that requires a construction permit under chapter NR 406, Wis. Adm. Code;
- (d) If the results of the evaluation required by I.XXX.1.b.(6)(c), indicate a construction permit is required pursuant to ch. NR 406, Wis. Adm. Code, the permittee shall prepare and submit a construction permit application along with the associated application fee to the department for review;
- (e) The permittee may not operate at an increased ammonia emission rate allowed under I.XXX.1.a.(2)(c) until either: (i) A construction permit is issued by the department if one is required; or (ii) The department provides written approval to operate at an increased ammonia emission rate, based on review of the information submitted under this condition.

[s. NR 407.09(4)(a)1., Wis. Adm. Code]

**I.XXX.1.b.(7)** If complying with I.XXX.1.a.(2)(d), the permittee shall:

- (a) Measure the maximum worst-case ammonia concentration in the exhaust gas in the stack while at the same time measuring or calculating the corresponding ammonia emission rate;
- (b) Submit the results of the ammonia stack gas concentration measurements and ammonia emission rate as determined in I.XXX.1.b.(7)(a);
- (c) If the results of the measurements required by I.XXX.1.b.(7)(a) show an increased ammonia emission rate can be allowed while the ammonia stack gas concentration is maintained at less than the concentrations allowed under column (g) of Table A of s. NR 445.07, Wis. Adm. Code, then the permittee shall evaluate whether the increase in emissions is a modification that requires a construction permit under chapter NR 406, Wis. Adm. Code;
- (d) If the results of the evaluation required by I.XXX.1.b.(7)(c), indicate a construction permit is required pursuant to ch. NR 406, Wis. Adm. Code, the permittee shall prepare and submit a construction permit application along with the associated application fee to the department for review;
- (e) The permittee may not operate at an increased ammonia emission rate allowed under I.XXX.1.a.(2)(d) until either: (i) A construction permit is issued by the department if one is required; or (ii) The department provides written approval to operate at an increased ammonia emission rate, based on review of the information submitted under this condition.

[s. NR 407.09(4)(a)1., Wis. Adm. Code]

**I.XXX.1.c.(3)** The permittee shall maintain records as follows:

(a) If complying with condition I.XXX.1.a.(2)(a), the permittee shall keep daily records of hexa use for:

- (i) Tower A;
- (ii) Tower B; and

- (iii) Towers A and B combined.
- (b) If complying with condition I.XXX.1.a.(2)(b), (c) or (d), the permittee shall keep records of either:
- (i) the daily average, hourly ammonia emissions, as calculated in I.XXX.1.b.(4); OR
  - (ii) the ammonia control device parameter operating value(s) as monitored according to I.XXX.1.b.(4) and as approved by the department in writing.
- [s. NR 439.04(1)(d), Wis. Adm. Code]

**I.XXX.1.c.(4)** The permittee shall maintain records of:

- (a) The report summarizing any compliance emission testing performed under I.XXX.1.b.(5);
- (b) The ammonia control efficiency determined during any testing;
- (c) A copy of any department's written approval to use a control efficiency when performing the calculations in I.XXX.1.b.(1), (2), and (4);
- (d) A copy of the normal operating ranges established for the control device parameters monitored during the emission testing performed under I.XXX.1.b.(5);
- (e) A copy of any department approval to use ammonia control device parameter monitoring to demonstrate compliance with I.XXX.1.a.(2)(b), (c), or (d) in lieu of daily average, hourly ammonia emission calculations as allowed in I.XXX.1.b.(4);
- (f) If complying with I.XXX.1.a.(2)(c), a copy of the information required by I.XXX.1.b.(6) and written department approval to operate at an increased ammonia emission rate; and
- (g) If complying with I.XXX.1.a.(2)(d), a copy of the information required by I.XXX.1.b.(7) and written department approval to operate at an increased ammonia emission rate.

[s. NR 439.04(1)(d), Wis. Adm. Code]

Formaldehyde Emissions: Formaldehyde emissions from the facility were shown by the applicant to be above the significant levels in Table 3, of ch. NR 407, Wis. Adm. Code, but below the threshold levels in Table A of s. NR 445.07, Wis. Adm. Code. As such, the facility is subject to general limitations for formaldehyde emissions as outlined in Part II of the operation permit. However, the permittee requested in their comments that formaldehyde emissions from the facility be addressed in the renewed operation permit. While not necessary, section I.XXX.2. was added to the draft permit to address the permittee's comment.

**I.XXX.2.a.(1)** \* The owner or operator of a source that emits a hazardous air contaminant for which a control requirement is identified in column (i) of Table A in a quantity greater than the amount listed in column (c), (d), (e), or (f) of Table A for the contaminant shall control emissions of the contaminant to the level identified in column (i) of the table. Control requirements shall be applied according to the procedures in s. NR 445.08(2)(f), Wis. Adm. Code. [s. NR 445.07(1)(c), Wis. Adm. Code]

**I.XXX.2.b.(1)** Because the maximum theoretical formaldehyde emissions from the facility are less than the corresponding s. NR 445.07, Wis. Adm. Code, Table A value of 4,712 pounds per year for stacks that are greater than 75 feet, no further requirements are necessary to comply with ch. NR 445, Wis. Adm. Code for formaldehyde. The permittee shall maintain the records required by I.XXX.2.c.(1) to document the maximum theoretical formaldehyde emissions from the facility. [ss. NR 407.09(4)(a)1. and NR 439.04(1)(d), Wis. Adm. Code]

**I.XXX.2.c.(1)** The permittee shall maintain records to document the maximum theoretical formaldehyde emissions from the facility. [s. NR 439.04(1)(d), Wis. Adm. Code]